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October 25, 2023

VIA ECF

The Honorable Valerie Figueredo
Southern District of New York
500 Pearl Street
New York, New York 10007

**Re: *Baliga v. Link Motion Inc. et al.*, 1:18-cv-11642 (S.D.N.Y.) (VMI) (VFR):
Motion for Extension of Time to File Opposition to Motion to Dismiss**

Dear Judge Figueredo:

Undersigned counsel writes on behalf of Plaintiff Wayne Baliga to request a twenty-eight-day extension of time to file his Opposition to Defendant Vincent Wenyong Shi's Motion to Dismiss the Common Law Fraud Claim. This would extend the deadline from October 25, 2023, to November 22, 2023. Plaintiff's counsel conferred with Michael James Maloney, counsel for Defendant Shi, who agreed to the requested twenty-eight-day extension. Counsel for Baliga circulated a draft stipulation on October 20, 2023. In response, Maloney requested until December 21, 2023, to respond to the Baliga's Opposition. Counsel for Baliga consented to request.

Ultimately, the Parties could not reach agreement on the language of the Stipulation for Extension of Time. Baliga does not concede that Maloney had authority to file the Motion to Dismiss the Common Law Fraud Claim on behalf of Link Motion, Inc. and reserved the right to challenge Maloney's authority to act on behalf of Link Motion in the draft stipulation. Counsel for Shi took issue with Baliga's draft language and did not respond after 3:30 pm, October 23, 2023. Because today is the opposition deadline, Baliga files this motion in place of the previously intended stipulation.

The Parties have not made any prior requests for extension of time regarding these filings.

Respectfully submitted,

GREENBERG TRAURIG, LLP

By: /s/ Toby S. Soli
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cc: All counsel of record (via ECF)

MEMO ENDORSED

HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE
DATED: October 30, 2023

The extension requested herein is granted. A conference to address the issue regarding Mr. Maloney's representation of Vincent Wenyong Shi and Link Motion, Inc. is hereby scheduled for November 14, 2023 at 11:00 a.m. Counsel for the parties are directed to call Judge Figueredo's AT&T conference line at the scheduled time. **Please dial (888) 808-6929; access code [9781335].** The Clerk of Court is directed to terminate the motion at ECF No. 489.